REMARKS

I.   Status of Claims

Claims 1-16, 28-32 are pending in this application. By this amendment, claims 1, 7, 28, and 29 have been amended, and new claims 30-32 have been added to further round out the scope of protection the applicant is entitled to. In view of the above amendments and the following remarks, reconsideration and prompt early allowance are respectfully requested.

II.   Rejection of Claims 1-3, 7-10, 12, 15, 16, 28, and 29 under 35 U.S.C. §103(a)

Claims 1-3, 7-10, 12, 15, 16, 28, and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,161,126 to Wies *et al.* (hereinafter "Wies") in view of U.S. Patent No. 6,028,605 to Conrad *et al.* (hereinafter "Conrad"). This rejection is respectfully traversed.

The references, even if combined, fail to teach the limitations of independent claims 1, 7, and 28. Both references fail to disclose several features of the independent claims. Specifically, in regards to claim 1, both references fail to disclose "behaviors of the same category of the at least one external component **participate** with the behaviors of the core engine," wherein **"participation includes the at least one external component delegating some processing of the behaviors of the same category to the core engine."**

The Office Action alleges that Conrad teaches that "participation" with the core engine can be accomplished through a plug-in, which is a "special-purpose component designated to be a mechanism for extending functionality of already deployed system" and cites the Abstract, Col.2 lines 1-15, Col.3 lines 39-48, lines 63-67, Col.10 lines 46-60 and Col.4 lines 45-55. However, as explained on page 2 lines 8-19 of the applicant's specification, **plug-ins do not participate with a core engine**. Plug-ins completely take over processing of an element from

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the core engine on a wholesale basis. A core engine does not participate in the processing of elements that are processed by a plug-in. Likewise, plug-ins cannot delegate some of the processing to the core engine. Plug-ins represent an all-or-nothing affair; either a plug-in takes complete control of processing an element, without support from the core engine, or it does not execute the processing of the element. A plug-in, as taught by Conrad, therefore, does not participate with a core engine and thus Conrad cannot possibly teach all limitations of claim 1.

In regards to Weis, Wies discloses a system for implementing "force feedback". Force feedback allows a user to experience tactile sensations using computer controlled sensors and actuators on a force feedback device. The Wies system is particularly directed to implementing the force feedback experience in web pages. The Office Action references Col. 23 lines 35-38, Col.22 lines 55-57, Col.28 lines 5-65, and Col.29 lines 1-67 of Wies to show the external component and its participation with the core engine through a pair of interfaces. This section of Wies describes Microsoft's Active Accessibility system that provides enhanced functionality for users with disabilities. An active accessibility program runs on a client machine external to a web browser and is hooked into mouse moves. In contrast to the system of claim 1, the active accessibility program **fails to participate** with the core engine to provide additional functionality for a corresponding category of behavior such as a layout or rendering behavior as set forth in claim 1. Instead, the accessibility program provides an entirely different category of functionality that is not provided by the core engine to enable force feedback.

Moreover, the combination of Wies and Conrad also fails to teach or disclose other limitations of claim 1. Conrad fails to disclose a "markup language core engine for providing categories of behaviors including **layout** and **rendering** behaviors." "**Layout behaviors**" are behaviors that specify how markup language elements are to be laid out, or positioned and sized

on a medium (see specification page 8 line 22 thru page 9 line 1). "**Rendering behaviors**" are behaviors that specify how markup language elements are to be rendered, or drawn on a medium (see specification page 8 lines 21-22). Conrad discloses no teaching of layout behaviors that specify how the markup language is supposed to be laid out or rendering behaviors that specify how markup language elements are to be rendered. Conrad teaches class categories (col.3 lines 63-67), however, these class categories merely "collaborate to provide a set of services." Conrad does not disclose the categories are layout behaviors and rendering behaviors.

Moreover, Conrad does not teach a "**mechanism**" included in the core engine to extend a selected category of behavior of the core engine with the behaviors of a same category of the at least one external component. There is no teaching of a core engine by Conrad, let alone a teaching of a "mechanism" included in the core engine to extend behaviors.

In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686,688 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

Additionally, Conrad fails to provide a teaching or suggestion for modifying Wies. No motivation would have existed to modify Wies to include a plug-in as disclosed by Conrad. Wies is directed to providing an entirely different category of functionality and not to extending existing capabilities of the core engine in a selected category of behavior. Accordingly, no motivation would have existing for adding a plug-in as disclosed by Conrad to the force effects system disclosed by Wies.

In order to make a prima facie case of obviousness, a teaching or suggestion of the combination must be found in the prior art. *In re Vaeck,* 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Also, if a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon,* 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Claims 2, 3, and 30 depend from claim 1 and therefore define over the art of record for at least the reasons set forth with respect to claim 1. Additionally, new claim 30 is allowable because Wies and Conrad in combination fail to disclose external component behaviors participating with core engine behaviors of the same category to any degree.

Regarding claim 7, both references, even if combined, fail to disclose the limitations of claim 7. The combination of Wies and Conrad fails to disclose an external component behavior **participating** with a core engine behavior. More specifically, Wies and Conrad fail to teach "supplementing includes the at least one external component delegating some processing of the core engine behavior and the external component behavior, belonging to the same category of behavior, to the core engine in one mode, and participation includes replacing core engine behavior with external component behavior in another mode." The Office Action alleges that Conrad teaches that "participation" with the core engine can be accomplished through a plug-in, however for reasons stated above, plug-ins do not participate with the core engine. There is also no teaching by Conrad to suggest that external component behaviors participate with core engine behaviors in two different modes: one mode in which the external component behavior can participate as much or as little with the core engine behaviors, and another mode in which the external component behavior completely replaces the core engine behavior.

It should also be noted that the Office Action acknowledges that Wies does not teach the claimed devices such as "core engine," "external component," and "mechanism" of claim 1 (Office Action page 3 lines 1-8). However, the Office Action now contends that such devices are taught by Wies in regards to claim 7. Such assertion cannot be valid as it contradicts the Office Action's previous acknowledgement. Furthermore, Wies again discloses neither a "layout behavior" or a "rendering behavior" as stated in claim 7. Wies continues in failing to teach the limitations of claim 7 by not disclosing "calling a behavior initialization method of the external component to determine how the behavior of the external component participates with the behavior of the core engine," "calling a behavior method of the external component for the external component to provide the behavior of the external component when the core engine is providing the behavior of the core engine, so that the behavior of the external component participates with the behavior of the core engine," and "receiving a call to a corresponding behavior method of the mechanism for the external component to communicate with the core engine during participation of the behavior of the external component with the behavior of the core engine."

The combination of Wies and Conrad also fails to disclose a "behavior initialization method of the external component. In the Office Action's "Response to Arguments" it is alleged that Conrad mentions an initialization method (col.8 lines 16-17). However, a mere mentioning of an "initialization service" does not teach a "behavior initialization method of the external component **to determine** how the behavior of the external component participates with the behavior of the core engine." There is no determination step found in the mere mentioning of an "initialization service" that is equivalent to the initialization method stated in the above

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limitation of claim 7. Therefore the combination of Wies and Conrad does not fully disclose all limitations of claim 7.

Claims 8-10, 12, 15, 16, and 31 depend from independent claim 7 and are allowable over the art of record for at least the reasons set forth above with respect to claim 7. Additionally, new claim 31 is allowable because Wies and Conrad in combination fail to disclose external component behaviors participating with core engine behaviors of the same category to any degree.

Claim 28 is a computer-readable medium claim that includes features analogous to those set forth above with respect to claim 1 and therefore defines over the art of record for at least the reasons set forth above with respect to claim 1. Claims 29 and 32 depend from claim 28 and is therefore also allowable over the art of record. Additionally, new claim 32 is allowable because Wies and Conrad in combination fail to disclose external component behaviors participating with core engine behaviors of the same category to any degree.

As explained above, Wies and Conrad fail to render obvious claims 1-3, 7-10, 12, 15, 16, 28-32. Accordingly, withdrawal of the rejection of these claims under 35 U.S.C. §103 is respectfully requested.

III.   Rejections of Claims 4-6, 11 under 35 U.S.C. §103(a)

Claims 4-6 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Wies et al., in view of Conrad et al. as applied to claim 1 and in further view of U.S. Patent No. 6,585,777 to Ramaley et al. (hereinafter "Ramaley"). This rejection is respectfully traversed.

Ramaley fails to preclude the deficiencies of Wies and Conrad noted above. In the Office Action's "Response to Arguments" it is alleged that Ramaley cures the deficiencies of Wies and Conrad by "mention[ing] comparing files" and "mention[ing] attached behaviors that can be

applied and removed." A mere mentioning of comparing files and attached behaviors does not correct the deficiencies of Wies and Conrad in regards to independent claims 1, 7, and 28. Claims 4-6 depend from claim 1 and define over the art of record for at least the reasons set forth above with respect to claim 1. Claim 11 depends from claim 7 and is allowable over the art of record for at least the reasons set forth above with respect to claim 7. Accordingly, withdrawal of the rejection is respectfully requested.

IV.   Rejections of Claims 13 under 35 U.S.C. §103(a)

Claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wies *et al.*, in view of Conrad *et al.*, as applied to claim 12 and in further view of U.S. Patent No. 6,636,219 to Merrick *et al.* (hereinafter "Merrick"), and in further view of Ramaley *et al.*, and in further view of U.S. Patent No. 6,324,551 to Lamping *et al.* (hereinafter "Lamping"). This rejection is respectfully traversed.

Merrick, Ramaley, and Lamping fail to preclude the deficiencies of Wies and Conrad noted above. In the Office Action's "Response to Arguments" it is alleged that Lamping cures the deficiencies of Wies and Conrad by "mention[ing] a call being made to a document management system." A mere mentioning of a call being made does not correct the deficiencies of Wies and Conrad in regards to independent claims 1, 7, and 28. Claim 13 depends from claim 7 and defines over the art of record for at least the reasons set forth above with respect to claim 7. Accordingly, withdrawal of the rejection is respectfully requested.

V.   Rejections of Claims 14 under 35 U.S.C. §103(a)

Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wies *et al.*, in view of Conrad *et al.*, as applied to claim 12, in further view of Ramaley *et al.*, and in further view of Lamping *et al.* This rejection is respectfully traversed.
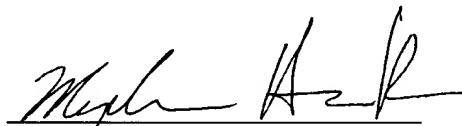
Ramaley and Lamping fail to preclude the deficiencies of Wies and Conrad noted above.

Claim 14 depends from claim 7. Accordingly, claim 14 defines over the art of record for at least

the reasons set forth above with respect to claim 7. Withdrawal of the rejection is respectfully

requested.

VI.   Conclusion

Applicants respectfully submit that the rejections have been overcome and claims 1-16,

28-32 are now believed to be in condition for allowance. Allowance of all pending claims is

respectfully requested. However, if the Examiner believes that any issues remain, the Examiner

should feel free to contact the undersigned at the telephone number below. The Commissioner is

hereby authorized to charge any additional fees that are required or credit any overpayment to

Deposit Account No.19-2112 referencing MFCP 87510.

Respectfully submitted,

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